

AMENDMENT UNDER 37 C.F.R. § 1.111
Application Serial No. 10/802,843
Attorney Docket No. Q80463

REMARKS

Upon entry of the present Amendment, claims 1-11 and 13-23 are all the claims pending in the application. Claims 1 and 3 are amended and withdrawn claims 12 and 24-35 are cancelled without prejudice to subsequently pursue the withdrawn claims in one or more divisional applications.

As a preliminary matter, Applicant thanks the Examiner for acknowledging the claim for foreign priority and receipt of the certified copy of the priority document, as well as considering the references submitted in the Information Disclosure Statements of March 18, 2004 and January 4, 2006. However, Applicant notes that the Examiner has not indicated that the drawings submitted on March 18, 2004 have been accepted. Accordingly, the Examiner is kindly requested to indicate acceptance of these drawings in the next official communication.

To summarize the Office Action, claim 3 has been rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite, claims 1, 8-11 14-16, 20 and 23 have been rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Ohta et al. (U.S. Patent No. 6,208,399, hereinafter "Ohta"), and claims 19, 21, and 22 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ohta in view of Ashizawa et al (U.S. Patent Publication No. 2005/0275784, hereinafter "Ashizawa") and Sawasaki et al. (U.S. Patent Publication No. 2005/0024567, hereinafter "Sawasaki"). Further, the Examiner indicated that claim 3 would be allowable if the 35 U.S.C. § 112, second paragraph rejection is overcome, and indicated that claims 2, 4-7, 13, 17, and 18

AMENDMENT UNDER 37 C.F.R. § 1.111
Application Serial No. 10/802,843
Attorney Docket No. Q80463

are objected to as being dependent from a rejected base claim, but would be allowable if rewritten in independent form. Applicant respectfully traverses the outstanding rejections, as discussed in the following.

Claim Rejections - 35 U.S.C. § 112

The Examiner alleges that claim 3 is indefinite because certain features lack antecedent support. Applicant notes that claim 3 is presently amended to depend from claim 2, which introduces the second island-shaped electrically insulating organic film, the gate line terminal electrode, the third island-shaped electrically insulating organic film, and the data line terminal electrode and provides the requisite antecedent support for these elements. Accordingly, reconsideration and withdrawal of the 35 U.S.C. § 112, second paragraph, rejection of claim 3 is requested.

Claim Rejections - 35 U.S.C. § 102

As noted above, claims 1, 8-11, 14-16, 20 and 23 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Ohta. Applicant respectfully traverses and submits that Ohta fails to anticipate all the limitations of these claims, as demonstrated below.

Claim 1 defines a novel liquid crystal display device present new features. For instance, the liquid crystal display device of claim 1 comprises, *inter alia*, a first substrate including a thin film transistor, a data line, a pixel electrode, and a common electrode; a second substrate; and liquid crystal sandwiched between said first and second substrates. Claim 1 additionally recites the features of an image signal is applied to the thin film transistor through the data line to generate an electric field between the pixel electrode receiving the image signal and the common electrode such that the liquid crystal is rotated by the electric field in a plane which is in parallel with the first substrate.

As further recited, the first substrate includes an electrically insulating inorganic film covering the data line therewith; a first island-shaped electrically insulating organic film formed on the electrically insulating inorganic film above the data line; and a shield common electrode covering the first island-shaped electrically insulating organic film therewith and overlapping the data line when viewed vertically. Also, claim 1 recites the limitation of the first island-shaped electrically insulating organic film covers only the data line, a gate line and terminals therewith.

Notwithstanding the Examiner's rejection, Applicant submits that Ohta fails to teach at least at least the feature of the first island-shaped electrically insulating organic film covers *only* the data line, a gate line, and terminals therewith, as claimed. In this regard, Applicant notes, that as shown, for example, in Figure 25 of Ohta, Ohta teaches that the data line of the liquid crystal display is covered by an inorganic film, and an isolated organic film is formed on the inorganic film which covers the inorganic film. Through-holes are formed along the data

line, and a common electrode covers the through holes therewith, thereby the data line is *entirely covered* with the common electrode. *See* Ohta at col. 22, lines 44-64.

However, claim 1 of the present application is characterized in that the first island-shaped electrically insulating organic film covers *only* a data line, a gate line and terminals therewith, namely, the first island-shaped electrically insulating organic film does not exist in areas other than areas disposed above a data line, a gate line and terminals. In other words, the first island-shaped electrically insulating organic film is not formed in a pixel.

By virtue of structure defined by claim 1, the first island-shaped electrically insulating organic film is not exposed directly to etchant when a shield common electrode is formed. Thus, it is possible to form the first island-shaped electrically insulating organic film precisely, ensuring a widened process margin required for a material of which the first island-shaped electrically insulating organic film is composed. Additionally, since the first island-shaped electrically insulating organic film is not disposed in a pixel, it is possible to select a colored material for composing the first island-shaped electrically insulating organic film. These aspects would not be present in the liquid crystal display device of Ohta.

Indeed, as is evident from at least Figures 1 and 20-25 of Ohta, Ohta teaches that the organic film is formed on a pixel and therefore fails to suggest *at least* the feature of the first island-shaped electrically insulating organic film covers *only* the data line, a gate line and terminals therewith, as recited by claim 1. Accordingly, Ohta fails to suggest all the

AMENDMENT UNDER 37 C.F.R. § 1.111
Application Serial No. 10/802,843
Attorney Docket No. Q80463

limitations of claim 1, and reconsideration and withdrawal of the rejection is respectfully requested.

Further, Applicant submits that claims 2-11 and 13-23 are allowable at least by virtue of depending from claim 1.

Claim Rejections - 35 U.S.C. § 103

Claims 19, 21, and 22 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ohta in view of Ashizawa and Sawasaki. Without commenting substantively, Applicant submits that claims 19, 21, and 22 are allowable at least by virtue of depending from claim 1.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
Application Serial No. 10/802,843
Attorney Docket No. Q80463

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Brian K. Shelton
Registration No. 50,245

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: May 19, 2006